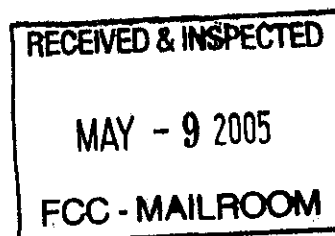




BOSTON PUBLIC LIBRARY

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**Boston Public Library's Request for Review to the FCC - Funding  
Year 2004-2005**

May 4, 2005

Federal Communications Commission  
Office of the Secretary  
445 - 12th Street, SW  
Washington, DC 20554

**Re:**

CC Docket	No. 02-6
Applicant Name:	Boston Public Library
Billed Entity Number:	149096
Form 471 Application Number:	410322
Funding Request Number(s):	1125179, 1125218
SLD Appeal Dated:	March 21 <sup>st</sup> 2005
Original Applicant Appeal:	January 13 <sup>th</sup> 2005

**Via Fax: 202-418-0187**

**Appeal Contact:**

Jennifer Latchford  
Boston Public Library  
700 Boylston Street  
Boston, MA 02116  
617.859.2211 (phone)  
617.424.8617 (fax)  
[jlatchford@bpl.org](mailto:jlatchford@bpl.org)

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Dear Sirs:

The Boston Public Library wishes to appeal the decision of March 21<sup>st</sup> by the USAC SLD Division rejecting the two FRN's listed above.

**For Funding Request Number 1125179:**

*Books are just the beginning.*

- The Boston Public Library appealed the initial rejection on the basis that this device functions as a switch, and switches are listed as eligible devices in the Eligible Services List. This device "selects paths for communication to our internet providers".
- The SLD rejected the appeal on the basis that according to information provided by the manufacturer, the Radware linkProof device is a network management appliance that provide traffic redirection, accelerated content delivery, bandwidth management and load balancing, which are ineligible capabilities according to program rules.

The Boston Public Library rejects the conclusion of the SLD. The Radware LinkProof switch may be utilized for a variety of tasks. It is the BPL's contention that the Radware Linkproof should fall within the SLD's Eligible Services List as a router. It was erroneously reported as a switch.

SLD's Eligible Services List describes routers as "switching devices that can act as an interface between two networks and connect different segments such as departments or floors in a building. Functionally, routers select the routing path for traffic, may provide features such as load balancing, and can provide trouble shooting diagnostics capabilities." (October 5<sup>th</sup> 2004)

The Boston Public Library is using its Radware Linkproof to connect networks together, controlling the routing of packets from source to destination and providing alternate paths when necessary. The Linkproof does just that. It provides traffic redirection by routing between our network and Internet Service Providers. It is not a network management appliance and bandwidth management is an option that was not purchased. The Linkproof, as most of Radware's products, are routers at their core. All other functionality builds upon this.

#### **For Funding Request Number 115218:**

- The Boston Public Library appealed the initial rejection of this FRN on the basis that the Cisco IP/TV video server is utilized for web-delivered video content and is not being utilized to store end user files.
- The SLD rejected the appeal on the basis that according to information provided by the manufacturer, the Cisco IP/TV 3432

is a video server used for video storage, which is an ineligible capability according to program rules.

- The Boston Public Library again rejects the conclusion of the SLD. The Cisco IP/TV Server may be utilized for a variety of things. The Boston Public Library is using the server to deliver video content to the web. Under the Video Equipment entry in the Eligible Services listing the SLD states that "video equipment used to transport information all the way to individual classrooms or other public areas of a library is eligible for discount". In addition, under the Web Servers entry in the Eligible Services listing the SLD states that "a web server used to provide content to users of the Internet is eligible for the discount". The applicant once again firmly states that the Cisco IP/TV Video Server is being utilized to deliver video content to web users.